

REMARKS/ARGUMENTS

The amendments set out above and the following remarks are responsive to the points raised by the Office Action dated February 8, 2007. In view of the amendments set out above and the following remarks, reconsideration is respectfully requested.

The Pending Claims

Claims 1-27 remain pending. Claims 1 and 16 are amended to define the invention more clearly. Support for claims 1 and 16 may be found in the specification at, e.g., page 3, lines 15-17.

Claim Objection

Claim 26 was objected to on the grounds that “the layers” lacks antecedent basis. Claim 26 is amended to correct this informality, thus obviating the objection to claim 26.

Specification Objection

The specification was objected to on the grounds of an informality. The specification has been amended to correct this informality, thus obviating the objection to the specification.

Claim Rejections

Claims 1, 2, 13, and 15 were rejected under 35 U.S.C. § 103 as unpatentable over what the Office Action characterizes as Applicant’s Admitted Prior Art (AAPA) in view of U.S. Patent No. 5,541,183 to Teng (hereinafter, “Teng”).

Claims 3-5 were rejected under § 103 as unpatentable over what the Office Action characterizes as Applicant’s Admitted Prior Art (AAPA) and Teng and further in view of U.S. Patent No. 3,264,103 to Cohen et al. (hereinafter, “Cohen”).

Claim 12 was rejected under § 103 as unpatentable over what the Office Action characterizes as Applicant’s Admitted Prior Art (AAPA) and Teng and further in view of U.S. Patent No. 5,317,080 to Arimatsu et al. (hereinafter, “Arimatsu”).

Claims 6-11 and 16-27 were rejected under § 103 as unpatentable over what the Office Action characterizes as Applicant's Admitted Prior Art (AAPA) and Teng as applied to claim 1 and further in view of U.S. Patent Publication No. 2003/0054153 to Kuczynski et al. (hereinafter, "Kuczynski").

Claim 14 was rejected under § 103 as unpatentable over what the Office Action characterizes as Applicant's Admitted Prior Art (AAPA) and Teng as applied to claim 1 and further in view of U.S. Patent No. 5,795,647 to Robinson et al. (hereinafter, "Robinson").

Each of these rejections is respectfully and separately traversed.

As an initial point, the Office Action characterizes page 1, lines 4-9, 11, and 17-18 of the present application as Applicants' Admitted Prior Art (AAPA). The Applicants traverse the characterization of these passages as Admitted Prior Art and assert that these passages of the specification are not Admitted Prior Art. In the Preliminary Amendment filed July 2, 2004, the specification was amended to insert the heading "Field of the Invention" before the first paragraph on page 1 and the heading "Background" before the second paragraph. These headings make clear that what is described in the first paragraph of the specification is the field of the invention, while what is described in the second paragraph is the background. This would, nevertheless, also be clear from the context of these passages.

Moreover, the first sentence of the second paragraph was amended to state that "methods and flexographic printing plates are already known." This statement makes it clear that it is only methods and flexographic printing plates *in general* that are known. The passage does not mean that the methods and flexographic printing plates *of the invention* are known. Nevertheless, even unamended, the reference to plates "of this type" as the first sentence of the Background section does not mean a blanket with those specific characteristics was known; it only refers to plates of a general type. Also, the passage at page 1, lines 17-18 does not contain any statement that the method is known, and does not mean that any of the characteristics of the claimed method are known. Accordingly, the above passages of the specification cannot be characterized as AAPA.

Even assuming, *arguendo*, that the above passages can be considered to be AAPA, the presently pending claims are not obvious over the cited references for the following reasons.

Amended claim 1 cannot be obvious because the alleged AAPA and Teng do not suggest insulating a layer of light sensitive material including SBS, SIS, or SEBS with a laser light having a wavelength of 390 nm to 410 nm, as claimed in amended claim 1. The method of amended claim 1 was not obvious at the time the invention was made because light at the claimed wavelengths was not adapted to the claimed light sensitive material SBS, SIS, or SEBS. The advantages of the low-cost laser light having a wavelength of 390 to 410 nm are fully realized when using a light sensitive material including SBS, SEBS, or SIS, as claimed. Accordingly, amended independent claim 1 is not obvious over the cited references.

Moreover, the printing plates of Teng have a structure that is so different from the structure of the claimed flexographic printing plate that one of ordinary skill in the art would not be led to use the laser light wavelength of Teng on the flexographic printing plate of the invention. Teng relates to lithographic printing plates, i.e., offset plates, which are fundamentally different from the flexographic printing plate of the invention. Teng teaches a printing layer of Teng with a coverage of from 100 to 5000 mg/m² (col. 5, lines 21-23). Accordingly, the thickness of the printing layer of Teng is on the order of microns. In contrast, the thickness of the flexographic layer according to the invention is on the order of millimeters, as claimed in claim 18, which is several orders of magnitude thicker than the printing layer of Teng. Thus, one of ordinary skill in the art would not be led to use the laser light wavelength of Teng, which was used on a thin printing layer, on the flexographic printing plate of the invention, having a thickness from 0.5 to 2 mm (claim 18). Accordingly, amended independent claim 1 is not obvious over the cited references.

Moreover, the Applicants assert that one of ordinary skill in the art would not use laser light technology from the field of offset plates, such as that described in Teng, for the manufacture of flexographic plates because the polymers used in offset plates and the polymers used in flexographic plates have different physical properties. Thus, one of ordinary skill in the art would not use the laser light of Teng having a wavelength of about 410 nm used for offset plates in the presently claimed method of producing flexographic printing plates. Accordingly, amended independent claim 1 is not obvious over the cited references.

Dependent claims 3 and 4 are also allowable, not only because they depend from allowable independent claim 1, but also because they define limitations not taught by the cited references.

The Office Action correctly acknowledges that the alleged AAPA and Teng fail to teach that the non-crosslinked zones are removed by liquefying the zones which are not crosslinked thermally, without using solvents. According to the Office Action, Cohen teaches a dry process without the use of solvents. The Applicants assert that Cohen does not teach removal of non-crosslinked zones by liquefying these zones without solvents, as claimed in claim 3, or a process of melting at the specific temperatures in claim 4.

Dependent claim 6 is also allowable, not only because it depends from allowable independent claim 1, but also because it defines limitations not taught by the cited references.

The Office Action correctly acknowledges that the alleged AAPA and Teng fail to teach that the light sensitive material is a photo-polymer containing at least two complementary crosslinking systems. According to the Office Action, Kuczynski teaches a crosslinking system for flexographic printing plates comprising two complementary systems.

However, the passages at paragraphs [0062] to [0064] and [144] of Kuczynski do not relate to at least two complementary crosslinking systems in a light sensitive material layer, as claimed. Rather, these passages relate to the *compressible* layer 11, while the photopolymer layer of Kuczynski is layer 10. Kuczynski fails to teach a light sensitive material layer containing at least two complementary crosslinking systems, as claimed in claim 6. Accordingly, claim 6 is patentable over the cited references.

Since the independent claims are allowable for the reasons set forth above, the dependent claims are also allowable because they depend from allowable independent claims.

Conclusion

For the reasons set forth above, reconsideration is respectfully requested.

Applicants respectfully submit that the patent application is in condition for allowance. If, in the opinion of the Examiner, a telephone conference would expedite the

prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

Stephanie M. Lawley

Stephanie M. Lawley, Reg. No. 55362
LEYDIG, VOIT & MAYER
700 Thirteenth Street, N.W., Suite 300
Washington, DC 20005-3960
(202) 737-6770 (telephone)
(202) 737-6776 (facsimile)

Date: Aug 7, 2007

SML/tdh